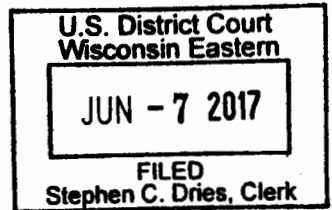


UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN



SHONDA MARTIN,

Plaintiff,

v.

Case No. 14-CV-200-JPS

COUNTY OF MILWAUKEE and  
XAVIER D. THICKLEN,

**SPECIAL VERDICT**

Defendants.

We, the jury, duly impaneled and sworn, for our special verdict in the above-entitled action, find as follows:

**CLAIM NO. 1**

DUE PROCESS AGAINST XAVIER D. THICKLEN

**Question No. 1:** (See Part II of the Jury Instructions, Section 1)

Did Xavier D. Thicklen violate Shonda Martin's right to bodily integrity by causing Shonda Martin to engage in unwanted sexual acts, harming Shonda Martin as a result?

Answer:

Yes

(Yes or No)

**Question No. 2:** (See Part II of the Jury Instructions, Sections 1 and 4.1)

*Note: Answer this question if, and only if, you answered "Yes" to Question No. 1.*

What sum of money, if any, will fairly and reasonably compensate Shonda Martin for the harm she sustained as a result of the actions of Xavier D. Thicklen?

Answer: \$ 1.7 million  
(Amount)

**Question No. 3:** (See Part II of the Jury Instructions, Section 4.2)

*Note: Answer this question if, and only if, you answered "Yes" to Question No. 1.*

Was the conduct of Xavier D. Thicklen malicious or in reckless disregard of Shonda Martin's rights?

Answer: Yes  
(Yes or No)

**Question No. 4:** (See Part II of the Jury Instructions, Section 4.2)

*Note: Answer this question if, and only if, you answered "Yes" to Question No. 3.*

What sum of money, if any, do you award against Xavier D. Thicklen as punitive damages?

Answer: \$ 5 million (1 million per incident)  
(Amount)

**CLAIM NO. 2**

INDEMNIFICATION AGAINST COUNTY OF MILWAUKEE

**Question No. 5:** (See Part II of the Jury Instructions, Section 2)

*Note: Answer this question if, and only if, you answered "Yes" to Question No. 1.*

Was Xavier D. Thicklen acting within the scope of his employment for the County of Milwaukee when he violated Shonda Martin's constitutional rights?

Answer: Yes  
(Yes or No)

**CLAIM NO. 3**

RESTRAINT POLICY AGAINST COUNTY OF MILWAUKEE

**Question No. 6:** (See Part II of the Jury Instructions, Section 3)

Was the use of restraints on Shonda Martin during her labor, delivery, and post-partum care at the hospital not rationally related to a legitimate non-punitive governmental purpose or excessive in relation to the purpose?

Answer: Yes  
(Yes or No)

**Question No. 7:** (See Part II of the Jury Instructions, Section 3)

*Note: Answer this question if, and only if, you answered "Yes" to Question No. 6.*

Did the application of the County of Milwaukee restraint policy cause Shonda Martin to be restrained during her labor, delivery, and post-partum care at the hospital, causing her harm?

Answer: No  
(Yes or No)

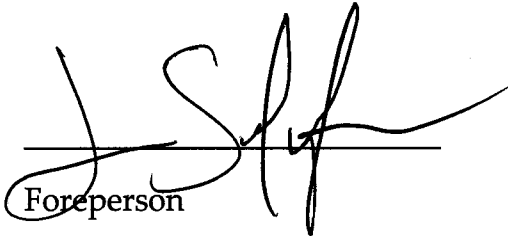
**Question No. 8:** (See Part II of the Jury Instructions, Sections 3 and 4.1)

*Note: Answer this question if, and only if, you answered "Yes" to Questions No. 6 and 7.*

What sum of money, if any, will fairly and reasonably compensate Shonda Martin for the harm she sustained as a result of the application of the County of Milwaukee's restraint policy?

Answer: \$         
(Amount)

Dated at Milwaukee, Wisconsin, this 7 day of June, 2017.

  
Foreperson